

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

JASMINE DIAZ, ET AL.,

Plaintiffs,

v.

NEW WORK CITY, INC., ET AL.,

Defendants.

) Case No. 5:16-cv-2319

) JUDGE SARA LIOI

) **EXHIBIT H: DECLARATION OF**  
) **CONSTANCE SHANNON**

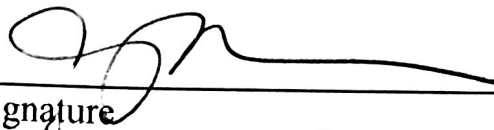
1. I am over 18 years old and competent to make the following representations and give the following consent in this matter.
2. I have personal knowledge of the matters referenced herein.
3. I am a named plaintiff in this case. I consent to bring this action on behalf of myself and all other similarly situated employees, who are also present or former employees of New Work City, Inc., which I understand also does business as American Medical Personnel.
4. I am a current employee of American Medical Personnel. I work and have been paid as an hourly employee of American Medical Personnel from approximately December 2015 to the present.
5. Throughout my employment, I have worked as an hourly Licensed Practical Nurse Personnel's clients' facilities providing medical and assisted living care. I regularly travel to jobsites, American Medical Personnel's client facilities, in Ohio.
6. During my orientation with AMP I was told that I would not be paid overtime. In order to receive compensation for my hours, I am required to submit a timecard reporting my full name and skill level, the name of the facility at which I worked, the date of my shift, the actual start time and end time of my shift, and the recorded lunch break; I am required to have my supervisor sign the timecard.
7. I have never been instructed to report my hours worked traveling between client facilities of American Medical Personnel during the work day. To my knowledge I have never been paid for my travel time between client facilities of American Medical Personnel, including during the instances in which I traveled between client facilities in the same workday.
8. In addition, I have worked more than forty (40) hours during workweeks for American Medical Personnel. I have not been paid overtime for all my hours over forty (40) hours, and I have not always been paid overtime at the time and one-half rate required.
9. Based upon my personal knowledge, I am aware that other hourly employees also suffered from the same violations. Defendants similarly failed to pay overtime at the time and

one-half rate required to other hourly employees and failed to pay for travel time during the workday to other hourly employees.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

2/13/17  
Date

  
Signature

Constance Shannon  
Printed Name

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